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June 28, 2006

BY ELECTRONIC FILING AND U.S. MAIL

Elizabeth A. French, Clerk
 U.S. District Court
 District of Massachusetts
 1550 Main Street
 Springfield, MA 01103

U.S. DISTRICT COURT
 MASSACHUSETTS
 JUN 29 2006
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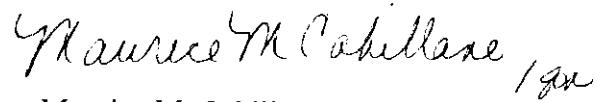
Re: Plasse vs. Tyco Electronics Corporation
 Civil Action No.: 04-CV-30056-MAP
 Response to Defendant's Letter of June 16, 2006

Dear Ms. French:

The Defendants have submitted a letter dated June 16, 2006 regarding the recent Massachusetts Superior Court case of *Covucci v. Keane Consulting Group, Inc.* The Plaintiff has the following response to the Defendant's citation of this case.

Defendant's reference to the *Covucci* case only serves to highlight the absence of evidence for their claims in the motion to dismiss. In *Covucci*, the Plaintiff admittedly lied about the existence of the computer itself and used deletion software to wipe the relevant computer clean. Here, in contrast, the Defendant's own expert's report shows that no relevant document was edited or created at the time the Defendants claim there was forgery. A second Defendant document expert found no evidence that the document was forged. There was no evidence of use of any deletion software in this case. Furthermore, *Covucci*, like all of the other cases cited by the Defendant, concerns fraudulent evidence on substantive matters directly relevant to the heart of the cause of action, matters that are significant enough to suggest a motive for tampering. Here, in contrast, we are only discussing an issue which, if relevant at all, would only go to the question of damages.

Sincerely,



Maurice M. Cahillane

cc: Jeffrey D. Clements, Esquire

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